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October 20, 2020

**VIA ECF**

Honorable Freda L. Wolfson, Chief Judge  
United States District Court- District of NJ  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street, Court Room 5E  
Trenton, NJ 08608

***Re: In re: Johnson & Johnson Talcum Powder Products Marketing,  
Sales Practices and Products Liability Litigation - MDL 2738***

Dear Chief Judge Wolfson:

Please accept this letter in further support of defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.'s Motions to Dismiss for failure to comply with the Court's May 15, May 26, June 4, September 17, and September 19, 2020 Orders regarding case-specific discovery for Stage One discovery pool cases.

Opposition to the motions was due on October 19, 2020. As of this filing, the 30 plaintiffs listed on attached Exhibit A have not filed oppositions to the motions. Defendants therefore respectfully request that these cases be dismissed with prejudice pursuant to Rule 41(b).

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Susan M. Sharko

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Honorable Freda L. Wolfson,  
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*Attorneys for Defendants Johnson &  
Johnson and Johnson & Johnson  
Consumer Inc.*

cc: All Counsel of Record (via ECF)

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Chief Judge

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**EXHIBIT A**

<b>No.</b>	<b>MDL Case Number</b>	<b>Plaintiff Name</b>	<b>Law Firm Name</b>
1.	3:18-cv-02366	ADKINS, BERNADINE	Johnson Law Group
2.	3:20-cv-03343	AMATO, FELICIA	Johnson Law Group
3.	3:19-cv-12776	BAXTER, JENNIFER	The Deaton Law Firm
4.	3:18-cv-00012	BENNINGTON, STAVROULA	Beasley Allen
5.	3:17-cv-10456	CARTER, DIANE	Beasley Allen
6.	3:19-cv-14466	COLEMAN, GEORGIA	Trammell PC
7.	3:18-cv-03680	COLLINS, VALERIE	Beasley Allen
8.	3:19-cv-19637	DOBRZELEWSKI, LYNNE	OnderLaw, LLC
9.	3:19-cv-14560	DOUGLAS, MATRELLE	Trammell PC
10.	3:17-cv-06861	ELLIS, MELISSA	Beasley Allen
11.	3:17-cv-10889	GOMEZ, MARIA	OnderLaw, LLC
12.	3:19-cv-09336	HANNAH, CAROL	Trammell PC
13.	3:19-cv-00987	HOUSLEY, YVONNE	Johnson Law Group
14.	3:19-cv-12734	HYKES, SCARLET	The Deaton Law Firm
15.	3:20-cv-02191	JACKSON, MELINDA	Trammell PC
16.	3:17-cv-10381	JOHNSON, ELIZABETH	Beasley Allen
17.	3:19-cv-20641	JONES, ROBERT	OnderLaw, LLC
18.	3:17-cv-09917	MARTIN, ALISON	OnderLaw, LLC
19.	3:18-cv-11020	O'MILLER, KATIE	OnderLaw, LLC

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Chief Judge

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No.	MDL Case Number	Plaintiff Name	Law Firm Name
20.	3:19-cv-13168	SAVAGE, CATHERINE	OnderLaw, LLC
21.	3:17-cv-09730	STAFFORD, TERRI	OnderLaw, LLC
22.	3:20-cv-00463	STUART, HELEN	OnderLaw, LLC
23.	3:18-cv-05588	SWANGIM, JERRIANNE	Blizzard Law, PLLC
24.	3:19-cv-16826	TATE, ROXANNE	OnderLaw, LLC
25.	3:20-cv-02662	TAYLOR, JENNIFER	OnderLaw, LLC
26.	3:20-cv-01552	TYRRELL, ASHLEY	OnderLaw, LLC
27.	3:19-cv-22099	UNDERWOOD, REGINA	OnderLaw, LLC
28.	3:19-cv-18063	WHITLEY, LOIS	OnderLaw, LLC
29.	3:19-cv-17011	WILLIAMS, ANDREA	OnderLaw, LLC
30.	3:19-cv-12031	WILLIAMS, ROSIE	OnderLaw, LLC